

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IDA RENAE NOBLES INDIVIDUALLY,
K.N. MINOR, BY AND THROUGH HIS
GUARDIAN KADEIDRA BELL, & L.N.,
MINOR, BY AND THROUGH HIS
GUARDIAN, MICHELLE DASHAUN
SMITH AS HEIRS AT LAW TO THE
ESTATE OF LANDON NOBLES,

Plaintiffs,

v.

SERGEANT RICHARD EGAL AND
CORPORAL MAXWELL JOHNSON,
Defendants.

FILED
DEC 15 2021
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY ~~CLERK~~
DEPUTY CLERK

A-19-CV-389-ML

VERDICT FORM

QUESTION ONE

Please answer "Yes" or "No" to each subpart.

1a. Did Richard Egal violate Landon Nobles's Fourth Amendment right to be protected from excessive force by using excessive force during the course of Mr. Nobles's shooting?

Answer: Yes

1b. Did Maxwell Johnson violate Landon Nobles's Fourth Amendment right to be protected from excessive force by using excessive force during the course of Mr. Nobles's shooting?

Answer: Yes

If you answered "Yes" to Question 1a, or 1b, please proceed to Question 2.

If you answered "No" to both Question 1a and 1b, do not answer any more questions, and please proceed to the last page and sign your Verdict Form.

QUESTION TWO

Please answer only as to the Defendant or Defendants for whom you answered “Yes” in Question 1. Please answer “Yes” or “No.”

2a. Do you find that Richard Egal’s actions during the shooting of Landon Nobles were objectively unreasonable in light of the clearly established law at the time, such that no reasonable officer could have believed that the shooting was lawful?

Answer:

Yes

2b. Do you find that Maxwell Johnson’s actions during the shooting of Landon Nobles were objectively unreasonable in light of the clearly established law at the time, such that no reasonable officer could have believed that the shooting was lawful?

Answer:

Yes

If you answered “Yes” to Question 2a or 2b, then proceed to answer Questions 3, 4, 5, 6, and 7.

If you answered “No” to both Question 2a and 2b, do not answer any more questions, and please proceed to the last page and sign your Verdict Form.

QUESTION THREE

What sum of money, if paid now in cash, would fairly and reasonably compensate Plaintiffs for their damages, if any, that they experienced as a result of Landon Nobles's injuries?

Consider the elements of damages listed below, and none other. Consider each element separately. Do not award any sum of money on any element if you have otherwise under some other element awarded a sum of money for the same loss. That is, do not compensate twice for the same loss, if any. Do not include interest on any amount of damages you find. Answer separately, in dollars and cents, for damages, if any. Any recovery will be determined by the court when it applies the law to your answers at the time of judgment.

Answer in dollars and cents, for damages, if any.

3. Physical pain and mental anguish experienced by Landon Nobles.

ANSWER: \$ 3.67 million
(3,670,000)

Please proceed to Question 4.

QUESTION FOUR

What sum of money, if paid now in cash, would fairly and reasonably compensate Ida Renae Nobles for her damages, if any, resulting from the death of her son, Landon Nobles?

Consider the elements of damages listed below, and none other. Consider each element separately. Do not award any sum of money on any element if you have otherwise under some other element awarded a sum of money for the same loss. That is, do not compensate twice for the same loss, if any. Do not include interest on any amount of damages you find. Answer separately, in dollars and cents, for damages, if any. Any recovery will be determined by the court when it applies the law to your answers at the time of judgment.

Answer separately, in dollars and cents, for damages, if any.

4a. Loss of companionship and society.

“Companionship and society” means the loss of the positive benefits flowing from the love, comfort, companionship, and society that Ida Renae Nobles, in reasonable probability, would have received from Landon Nobles had he lived.

Were sustained in the past:

ANSWER: \$ 2 million (2,000,000)

In reasonable probability will be sustained in the future:

ANSWER: \$ 4.3 million (4,300,000)

4b. Mental anguish.

Were sustained in the past:

ANSWER: \$ 3.5 million (3,500,000)

In reasonable probability will be sustained in the future:

ANSWER: \$ 7 million (7,000,000)

Please proceed to Question 5.

QUESTION FIVE

What sum of money, if paid now in cash, would fairly and reasonably compensate Kadeidra Bell, as Next Friend of K.N., for K.N.'s damages, if any, resulting from the death of K.N.'s father, Landon Nobles?

Consider the elements of damages listed below, and none other. Consider each element separately. Do not award any sum of money on any element if you have otherwise under some other element awarded a sum of money for the same loss. That is, do not compensate twice for the same loss, if any. Do not include interest on any amount of damages you find. Answer separately, in dollars and cents, for damages, if any. Any recovery will be determined by the court when it applies the law to your answers at the time of judgment.

Answer separately, in dollars and cents, for damages, if any.

5a. Loss of companionship and society.

"Companionship and society" means the loss of the positive benefits flowing from the love, comfort, companionship, and society that K.N., in reasonable probability, would have received from Landon Nobles had he lived.

Were sustained in the past:

ANSWER: \$ 500,000

In reasonable probability will be sustained in the future:

ANSWER: \$ 11.2 million (11,200,000)

5b. Mental anguish.

Were sustained in the past:

ANSWER: \$ 250,000

In reasonable probability will be sustained in the future:

ANSWER: \$ 11.2 million (11,200,000)

Please proceed to Question 6.

QUESTION SIX

What sum of money, if paid now in cash, would fairly and reasonably compensate Michelle Dashaun Smith, as Next Friend of L.N., for L.N.'s damages, if any, resulting from the death of L.N.'s father, Landon Nobles?

Consider the elements of damages listed below, and none other. Consider each element separately. Do not award any sum of money on any element if you have otherwise under some other element awarded a sum of money for the same loss. That is, do not compensate twice for the same loss, if any. Do not include interest on any amount of damages you find. Answer separately, in dollars and cents, for damages, if any. Any recovery will be determined by the court when it applies the law to your answers at the time of judgment.

Answer separately, in dollars and cents, for damages, if any.

6a. Loss of companionship and society.

“Companionship and society” means the loss of the positive benefits flowing from the love, comfort, companionship, and society that L.N., in reasonable probability, would have received from Landon Nobles had he lived.

Were sustained in the past:

ANSWER: \$ 500,000

In reasonable probability will be sustained in the future:

ANSWER: \$ 11.2 million (11,200,000)

6b. Mental anguish.

Were sustained in the past:

ANSWER: \$ 250,000

In reasonable probability will be sustained in the future:

ANSWER: \$ 11.2 million (11,200,000)

Please proceed to Question 7.

QUESTION SEVEN

If you have answered with any amount to any part of Question 3, 4, 5, or 6, and you find that Defendant Egal and/or Defendant Johnson acted willfully, or with callous and reckless indifference to the safety or rights of others, you may, but are not required to, exercise your discretion to award exemplary damages, also known as punitive damages. If you decide to award exemplary damages, you must use sound reason in setting the amount of damages.

Answer separately, in dollars and cents, for damages, if any.

7a. What sum of money, if paid now in cash, should be assessed against Defendant Richard Egal and awarded to Plaintiffs as exemplary damages, if any, for his actions?

ANSWER: \$ 187,500

7b. What sum of money, if paid now in cash, should be assessed against Defendant Maxwell Johnson and awarded to Plaintiffs as exemplary damages, if any, for his actions?

ANSWER: \$ 150,000

This is the end of the questions. Please proceed to the last page and sign your Verdict Form.

VERDICT OF THE JURY

We, the jury, unanimously answered the preceding questions by a preponderance of the evidence as instructed.

Submitted this 15th day of December, 2021 at 1:30 o'clock P.m.

ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002